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EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**

Case No.: 1:24-cv-24742-KMM

SKYE ADJUSTING, LLC, a Florida
Limited liability company, and
MADISON DUROW,
an individual,

Plaintiffs,

v.

GENERAL MOTORS LLC,
a foreign limited liability company,

Defendant.

/

**DEFENDANT GENERAL MOTORS LLC'S AMENDED AND SUPPLEMENTAL
EXPERT WITNESS DISCLOSURE**

Defendant, General Motors LLC (“GM”), pursuant to this Court's Scheduling Order [D.E. 55] and Fed. R. Civ. Pro. 26, hereby amends and supplements its expert disclosure of the following expert witnesses:

Tyler Grah
Field Service Engineer
General Motors LLC
1700 Great Oaks Way, Suite 400
Alpharetta, GA 30022
(Contact only through undersigned counsel)

A. Area of expertise:

Tyler Grah is an expert in the diagnosis and repair of motor vehicles, especially GM vehicles. Mr. Grah is an ASE Master Certified and GM World Class technician and has multiple years of experience in the diagnosis and repair of motor vehicles, including working as a Field Service Engineer for GM.

Mr. Grahl is presently employed as a Field Service Engineer with GM. As a Field Service Engineer, Mr. Grahl inspects, diagnoses, and repairs vehicles warranted by GM. A copy of his *curriculum vitae* is attached hereto.

B. Subject matter of expected expert testimony:

Mr. Grahl will testify regarding the operation and condition of Plaintiffs' vehicle and the nature and efficacy of any service performed on the vehicle. He is expected to testify regarding Plaintiffs' alleged complaints with the subject vehicle, including complaints of an alleged defective body, structural and vehicle supports, and the subject vehicle's warranty. Mr. Grahl also observed and manually inspected the subject vehicle including the body, structure and support components and will testify regarding his findings related to same as well as his findings after test driving the vehicle. He may also testify regarding GM's warranty and its applicability to Plaintiffs' vehicle's concerns. He is further expected to testify regarding his review of Plaintiffs' vehicle's service records, GM's records and/or other materials produced during discovery. Mr. Grahl may also offer testimony to rebut the findings and opinions of Plaintiffs' expert(s). See also Mr. Grah's attached inspection report.

C. Substance of the Facts and Opinions:

Mr. Grahl will testify regarding his review of the dealer service records, GM's records and warranty, and his observations and findings from his inspection and/or test drive. Mr. Grahl may also testify regarding the information contained within the repair orders and/or service invoices from authorized GM dealers and/or GM's warranty. Mr. Grahl may also offer testimony to rebut the findings and opinions of Plaintiffs' expert.

D. Summary of Grounds for Opinions:

Mr. Grahl' opinions will be based on his inspection and/or test drive of Plaintiffs' vehicle, data, measurements and samples obtained during his inspection and/or test drive of the vehicle, GM's written New Vehicle Limited Warranty, the vehicle's Owner's Manual, photographs of the vehicle, the dealer's service records, GM's records regarding the vehicle, comparing the subject vehicle to similar vehicles, any discovery and depositions taken in this case, as well as his education, training, experience, knowledge and background.

D. Availability for Deposition:

Mr. Grahl is available for deposition at a mutually agreeable date and time.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 31, 2025, a copy of the foregoing was emailed to the following: **Joshua Feygin, Sue your Dealer – A Law Firm at josh@jfeyginesq.com [Counsel for Plaintiffs].**

S/*Jens C. Ruiz*

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TYLER GRAHL

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DETAILS

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SKILLS

Analytical Thinking Skills
Knowledge of Technical Diagrams
Microsoft Office Excel & Word
Complex Problem Solving
Pico Scope
Oscilloscope
Data Bus Diagnostic Tool
VSpy Diagnostics
HP Tuners Software
ATRA Certified
ASE Master Certified A1-A9, L1, L2, L3, L4
ASE Body Certified B2-B5
ASE Master HD Truck T1-T8
ASE World Class Technician
GM World Class Technician

HOBBIES

FAA Certified Commercial Pilot
IHRA Top Dragster Driver Certified (2004-06)
Placed 10th in nation SKILLS USA competition for CNC machining
Extensive track experience with Corvettes & Porsche GT3 RS

PROFILE

Passionate field service engineer for one of the most technological advanced automotive manufactures in the world. Experienced with the latest cutting-edge tools and procedures. A strong communicator, able to address client questions and concerns. An extremely focused and detail-oriented technician who is capable of accurately analyzing, diagnosing, and repairing a variety of issues using advanced equipment and comprehensive checklists.

EMPLOYMENT HISTORY

Field Service Engineer at General Motors LLC, Detroit, MI

April 2021 — Present

Perform diagnostics and repairs on all GM platforms.
Test drive with customers, technicians, service managers, and help relay information to other technicians and management.
Write Field Product Reports for engineering.
Perform final repair attempts and legal inspections for GM
Authorize repairs and labor times for repair procedures
Instruct technicians on new diagnostic procedures and equipment
Diagnose assembly plant vehicle issues and write repair procedures for dealer network

Service Technician at Tarr Chevrolet Company Inc, Jefferson City, TN

February 2015 — April 2021

Perform diagnostics and repairs on all GM platforms.
Diagnose and repair all diesels and corvettes that come in the shop.
Test drive with customers and help relay information to other technicians and management.
Help dispatch work in shop and give assistance on electrical issues to other technicians

Shop Foreman at Free Service Tire Inc, Knoxville, TN

November 2011 — February 2015

Diagnose and repair vehicles of all make and models.
Dispatch work and sell work to customers.

Service Technician at Rusty Wallace Cadillac GMC Inc., Morristown, TN

December 2009 — November 2011

Diagnose and repair all GMC and Cadillac models
Kia Master Technician

Service Technician at Lifetime Kia Inc., Morristown, TN

July 2007 — November 2009

Earned Kia Master Certification
Diagnose and repair all Kia vehicles
Dealership closed in 2009

🎓 EDUCATION

Associates Degree in Specialized Technology, Wyotech, Laramie, Wy

September 2006 — June 2007

↳ REFERENCES

Charles Barnette from Morristown Chevrolet

[REDACTED]

Marty Pratt from East Tennessee Nissan

[REDACTED]

Jane Birdsall from Nokia-Alcatel- Lucent

[REDACTED]



VEHICLE FINAL REPAIR OPPORTUNITY or INSPECTION REPORT

Report Date: 12/30/2025

Inspection Date: 04/04/2025

Reason for Inspection: Final Repair Opportunity Legal Inspection

GM Representative Performing Inspection (name, title): Tyler Grahil GM FSE

Customer Name: Durow

Vehicle (year/division/model): 2024 Chevrolet Camaro

VIN: 1G1FK3D63R0115556 **TAC Case #** 9-14973487177

Mileage at start of Inspection: 302 **Mileage at end of inspection:** 311

Inspection Location: Boyd Chevrolet of Hendersonville, NC

Present at the Inspection (all parties; names & titles): Tyler Grahil FSE
Customer: Madison Durow and a adult male

Customer's historic concerns: Body and panel fitment complaints

Current concerns, if any, reported by customer: Customer complaints of poor body panel and hood fitment. Customer also stated that another repair facility said the front end of the vehicle was unsafe and not able to be driven.

Description of Inspection and Observations:

FSE inspected vehicle but did not make any repairs or removed any panels during the inspection. FSE measured hood gap between the hood and front bumper fascia. The perimeter gap around the hood was uneven and front leading edge of the hood was lower than the front bumper fascia. FSE believes the gap could be corrected with hood, hood striker, and bumper fascia adjustment. The front leading edge of the hood should sit below the bumper fascia to prevent wind noise and excessive air getting trapped under the hood, causing the hood to rattle. Customer had a complaint of the rear bumper fascia attachment points on the left and right quarter panels. FSE inspected the attachment points and found very minimal protrusions and no adjustments will correct the customers' complaint. FSE compared other similar

Camaros after the inspection and found the panel fitment to be the same. The customer also had a complaint of an unsafe “Front End” and would not drive the vehicle. FSE inspected the front suspension, subframe, radiator support, and frame rails. FSE could not remove any panels during the inspection but did not find any safety concerns or issues with what was visible. The customer and the FSE test drove the vehicle during the inspection. The FSE drove the customers vehicle and did not notice any concerns or abnormalities during the test drive. The vehicle was towed back to the customers house because the customer did not feel safe driving it.

Pictures taken: yes no

If yes, number of pictures taken:

Video taken: yes no

If yes, number of videos taken:

Data saved/recorded/printed from Diagnostic tools: yes no

If yes, list data saved and attach relevant diagnostic printouts (*examples: battery test results, alignment measurements, GDS, freeze frame data, PicoScope files, realtime vehicle performance recordings*)

Signed by: *s/Tyler Grah*
Tyler Grah



2024/Chevrolet/Camaro

1G1FK3D63R0115556

VIN:1G1FK3D63R0115556

Mileage: 299



Overview

- Inspection took place at Boyd Chevrolet in Hendersonville, NC
- Present at time of the inspection- GM FSE Tyler Grahl, Madison Durow, and Mrs. Durow male spouse/companion



Left Front Cradle Bolts





Front Facia Underside





Right Front Wheel Area



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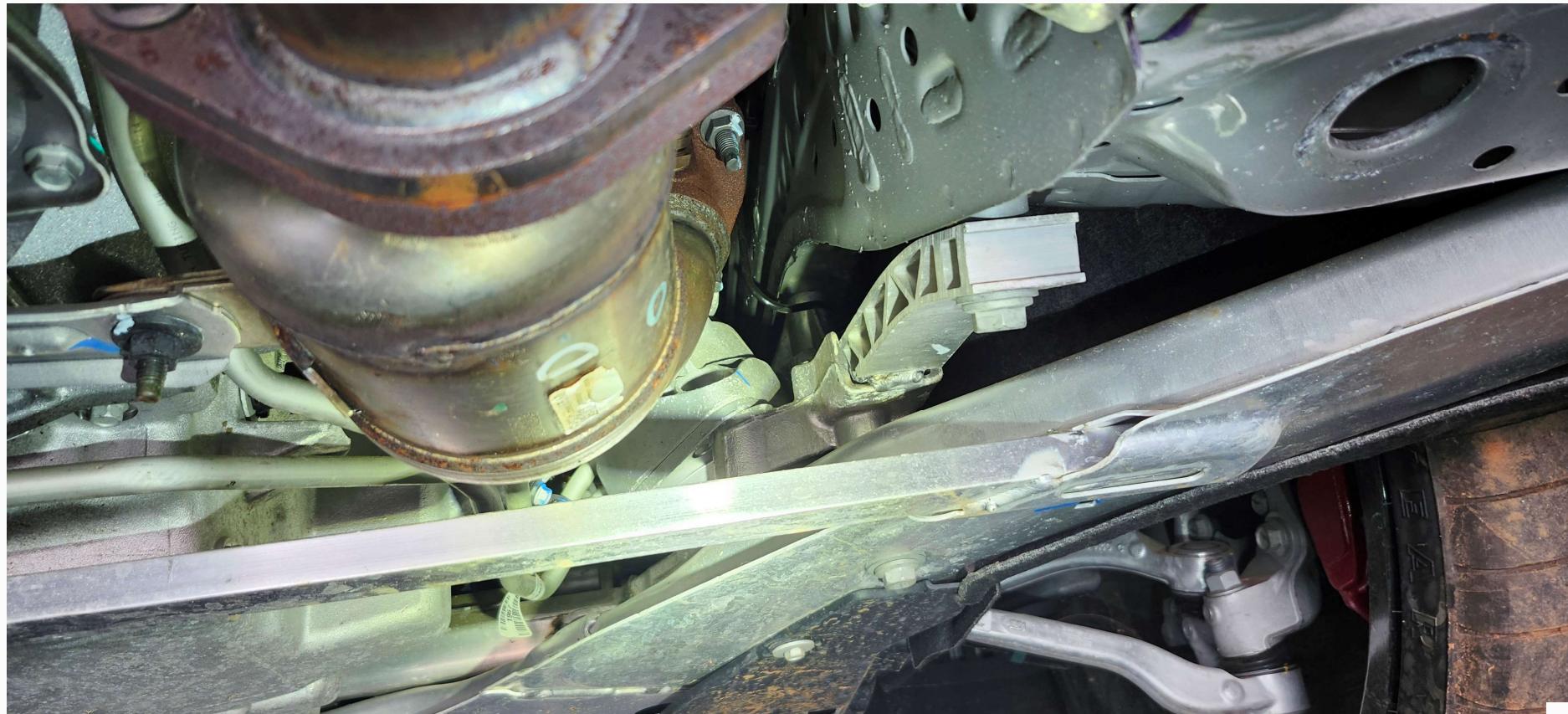
Left Front Wheel Area



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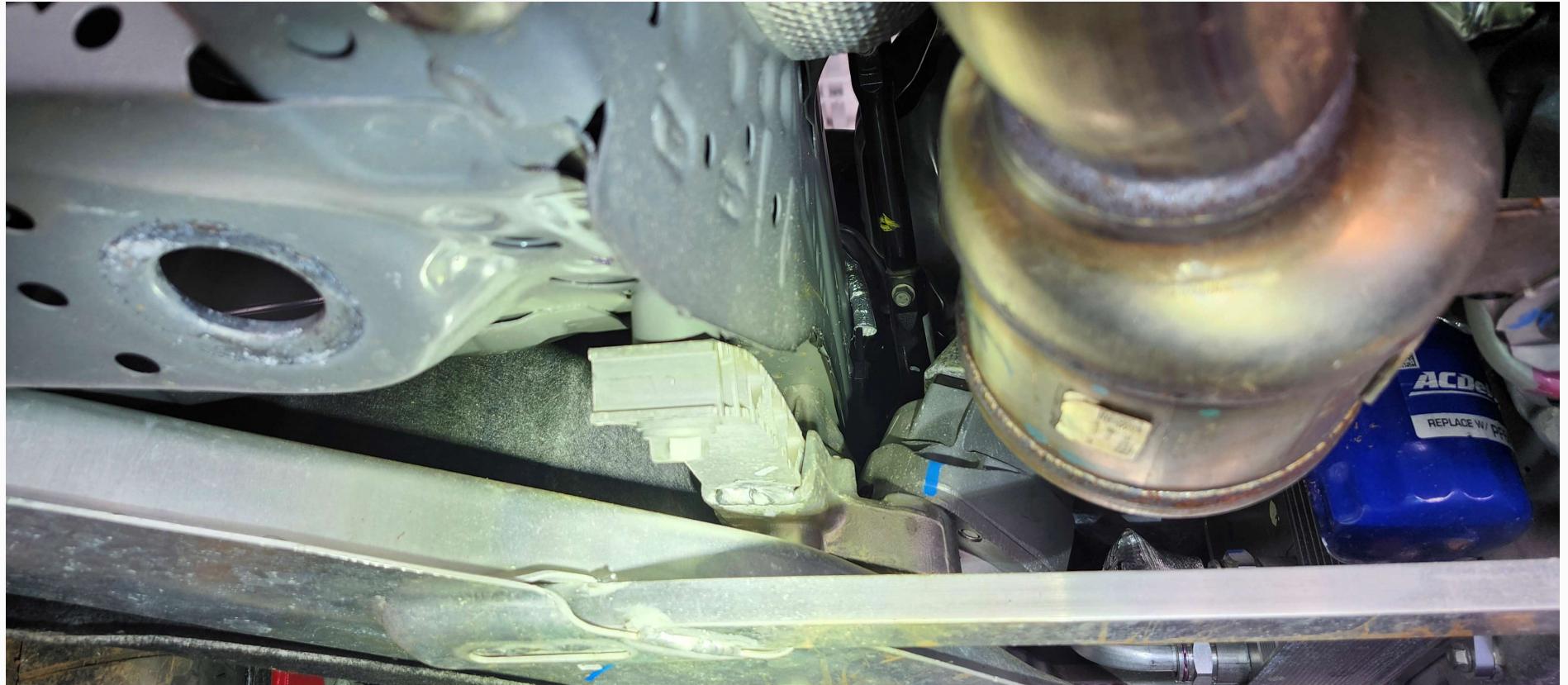
Right Front Rear Cradle Bolts



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Left Front Rear Cradle Bolts





Dent in Right Side of the Hood



Gap Between Facia and RF Fender



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Gap Between RF Fender and Facia



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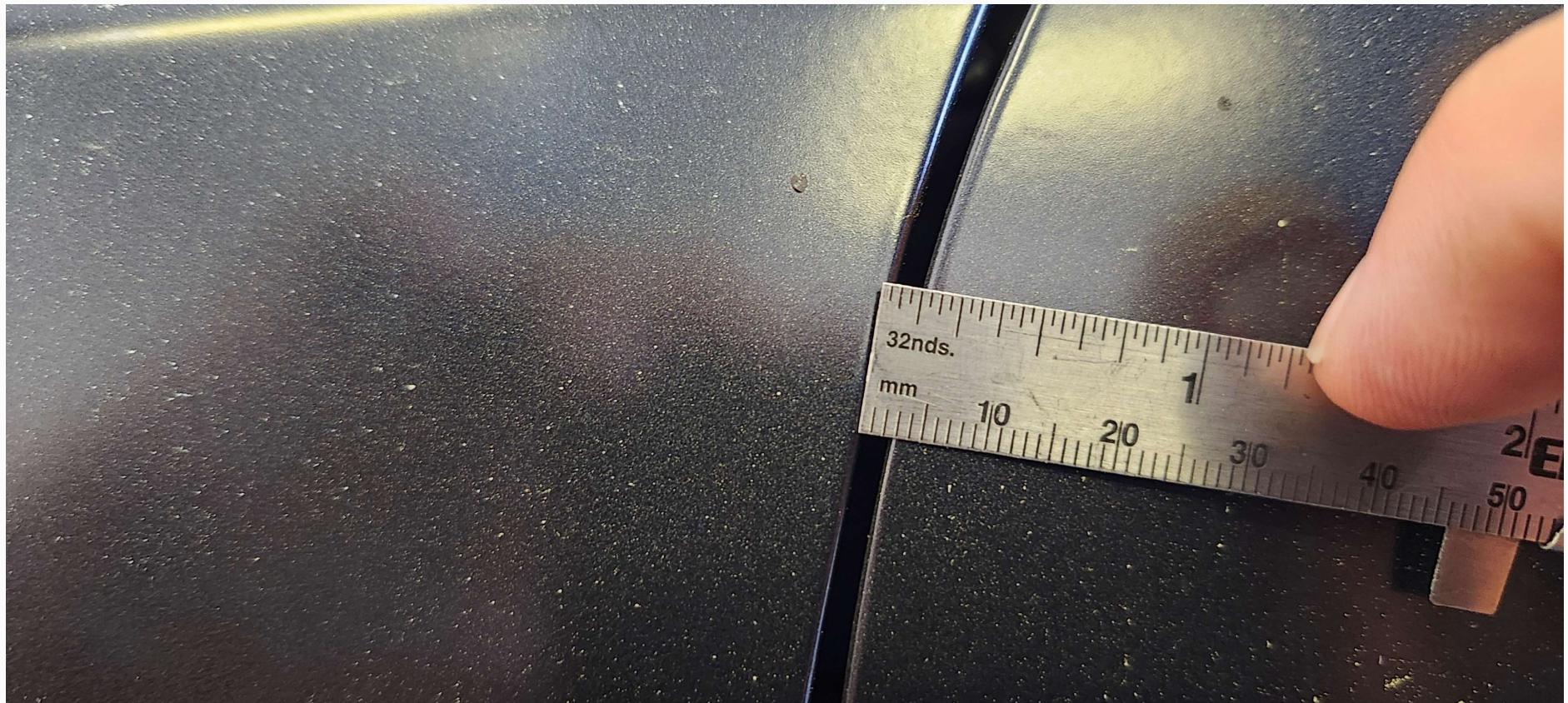
Gap Between LF Fender and Facia





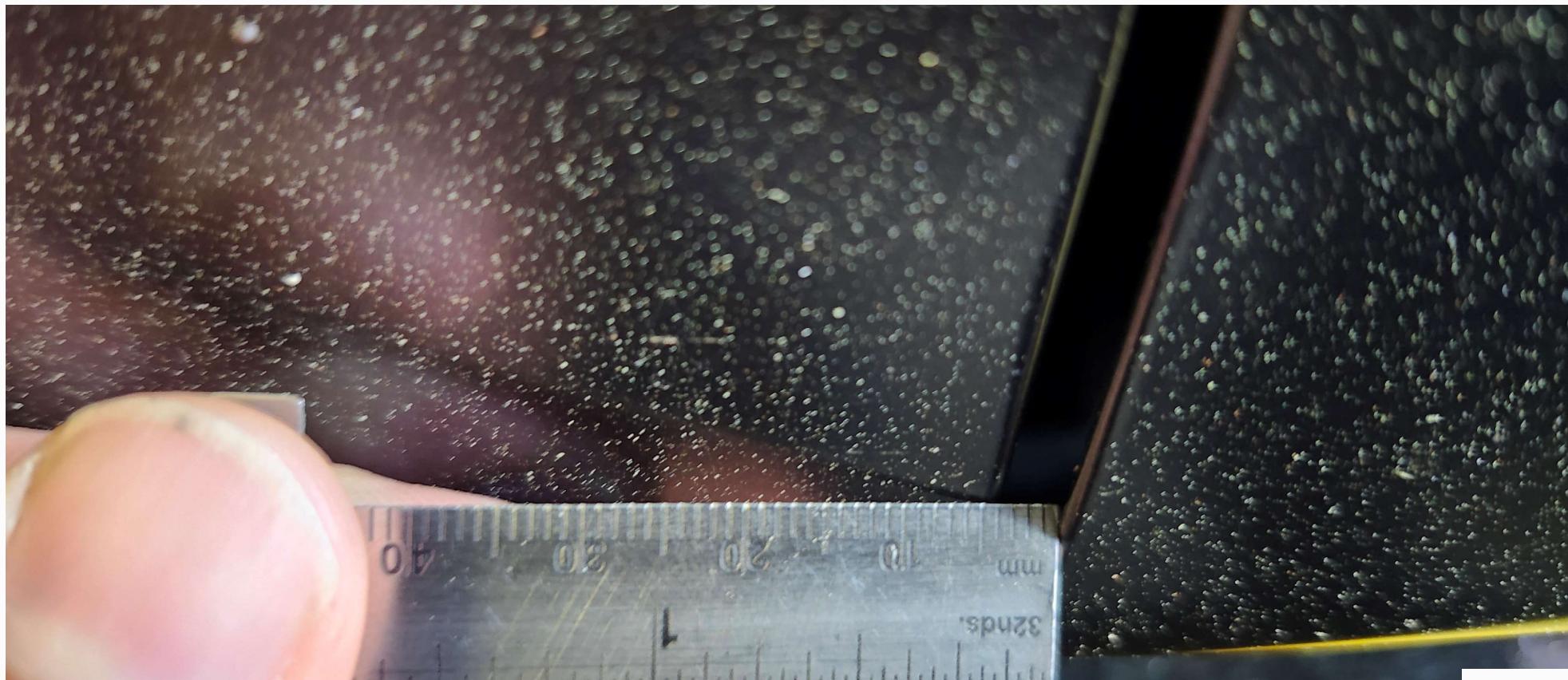


LF Fender to Door Gap Top





LF Fender to Door Gap Bottom



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LR Quarter Panel to Rear Bumper Facia



RR Quarter Panel to Bumper Facia



Driver Door Handle Key Cover



Hood to Front Facia Gap





Hood Gap at Center of Hood



Hood Gap at Left side or Hood



Left Side of Hood Gap

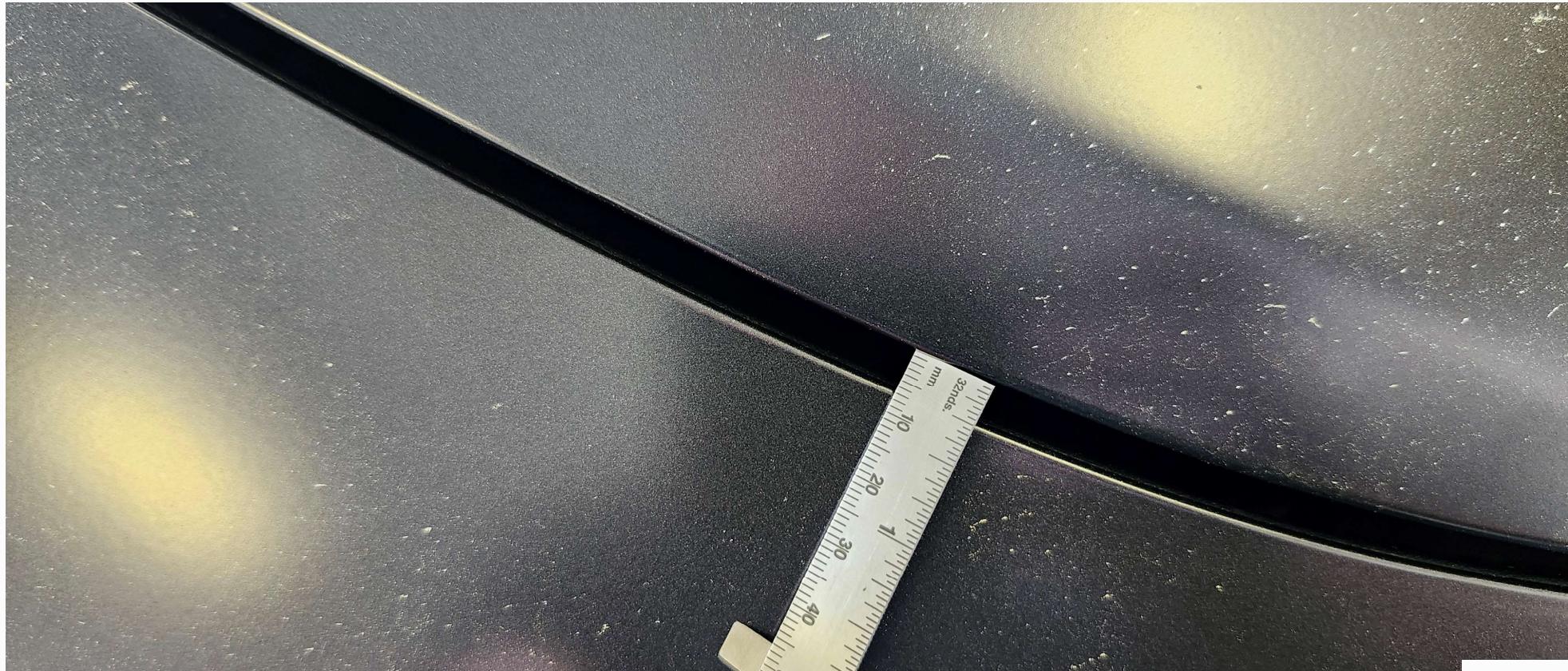


Right Side of Hood Gap





Hood Right Side Hood Gap



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Hood Left Side Hood Gap



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Center Console Right Side Panel Fitment



Center Console Right Panel Fitment



Current Repair Order

R.O.		VIN	BOYD			Chevrolet Buick			Telephone: 828-693-3461 Toll Free: 800-766-2693 Fax: 828-693-0091 Boyd Collision Center: 828-595-9444 Boyd Collision Center Fax: 828-595-9443 www.boydautomotive.com		
75994	1G1FK3D63R0115556		HENDERSONVILLE, NC						DATE	04/04/2025	
YEAR	MAKE	MODEL	COLOR	O 11223 HOLBERT COVE RD			TIME	11:56			
2024	CHEVROLET	CAMARO ZL1		SALUDA NC 28773			PROM:				
MILES IN	MILES OUT	FIRST USE	LISC.				ADVISOR:	RANDY \			
302	/ /	12/14/23	NC								
SERVICE CONTRACT:									H: (954) 260-1080 W: () -		
(1) LEGAL INSPECTION FOR FIELD SERVICE ENGINEER (W-68-A) TYLER GRAHL									TRANSPORTATION OPTIONS		
									<input checked="" type="checkbox"/> RENTAL	<input type="checkbox"/> SHUTTLE	
									<input type="checkbox"/> ONE WAY	<input checked="" type="checkbox"/> TWO	
									CUSTOMER INITIAL		
									APPOINTMENT <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	DAMAGE	
									ESTIMATE BY LAW YOU HAVE THE RIGHT TO AN ESTIMATE OF THE EXPECTED COST OF REPAIRS OR SERVICES.		
									Original Estimate \$ _____		
									INITIAL YOUR CHOICE WRITTEN ESTIMATE ORAL ESTIMATE NO ESTIMATE		
									CUSTOMER ACCEPTANCE Authorized Additions Date _____ Time _____ By _____		
									All parts are new or factory rebuilt unless specified otherwise. Replaced parts will be returned unless specified otherwise. Payment for parts and labor under manufacturers warranty are retained by the dealer for inspection by the manufacturer. <input checked="" type="checkbox"/> DISCARD		
									DISCLAIMER OF WARRANTIES Any warranties on the product sold hereby are those made by the manufacturer. The seller hereby expressly disclaims all warranties, either express or implied, including any implied warranty of merchantability or fitness for a particular purpose, and neither assumes nor assumes any person to assume for it any liability in connection with the sale of said products. The buyer takes the risk as to quality sold by the seller. All risks and responsibilities and performance of the product is with the buyer and/or manufacturer. If the product proves to be defective after purchase, the buyer and/or manufacturer, not the seller, shall assume the entire cost of all necessary remedies.		
									TERMS: STRICTLY CASH UNLESS ARRANGED OTHERWISE I hereby authorize the repair work herein set forth to be done by you along with the necessary parts and materials you determine to be required. I agree that you are not responsible for loss or damage to vehicle or articles left in vehicle in case of fire, theft, or any other cause beyond your control or for any delays caused by unavailability of parts or materials for any reason and that you will not waive nor authorize anyone to assume any liability in connection with such repair. I hereby grant you and/or your employees permission to operate the vehicle herein acknowledged.		

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Thank you